Privacy Impact Assessment for Non-Ministry Public Bodies

Implementation of Springshare's LibCal

PIA#2020-011

Why do I need to do a PIA?

Section 69(5.3) of the *Freedom of Information and Protection of Privacy Act* (FOIPPA) requires the head of a public body to conduct a privacy impact assessment (PIA) in accordance with the directions of the minister responsible for FOIPPA. Public bodies should contact the privacy office(r) for their public body to determine internal policies for review and sign-off of the PIA. Public bodies may submit PIAs to the Office of the Information and Privacy Commissioner for BC (OIPC) for review and comment.

If you have any questions about this PIA template or FOIPPA generally, you may contact the Office of the Chief Information Officer (OCIO) at the Privacy and Access Helpline (250 356-1851). Please see our PIA Guidelines for question-specific guidance on completing a PIA.

What if my initiative <u>does not include personal information</u>?

Public bodies still need to complete Part 1 of the PIA and submit it along with the signatures pages to their privacy office(r) even if it is thought that no personal information is involved. This ensures that the initiative has been accurately assessed.

Part 1 – General

Name of Department/Branch:	Justice Institute of British Columbia, Library		
PIA Drafter:	Christine-Louise Dujmovich		
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Program Manager:	April Haddad		
Email:	ahaddad@jibc.ca	Phone:	604-528-5594

In the following questions, delete the descriptive text and replace it with your own.

1. **Description of the Initiative**

   This PIA relates to the Justice Institute of British Columbia's ("**JIBC**") use of the LibCal software by Springshare. As per Springshare, "LibCal allows students and faculty to quickly see library space and librarian availability and easily schedule research seminars and class orientations, no more playing phone or email tag."

   LibCal is marketed as "an affordable, easy-to-use web platform designed to handle libraries' calendaring needs. Its four distinct modules work together to provide an integrated solution. Hours and Locations Management; Room and Equipment Reservations; Event Registration and Management; and Librarian Appointment Scheduler.

While LibCal is predominantly marketed to the library community, it will benefit many other JIBC Departments including Communications & Marketing, Learning Support & Disability Resources, Office of Indigenization and the Writing Centre by providing these areas with the ability to:

- promote events through the Events Calendar and offer attendee online registration.
- display staff availability and offer students specific times when they can book staff to assist, be it with library assistance, writing skills assistance, disability services, etc.

JIBC Library currently licenses Springshare's LibGuide application. We licensed and implemented this product in the fall of 2009 and our students have reaped the benefits of its use. We currently publish 45 guides dedicated to specific subject areas and library services. Librarians gather and organize specific resources and use a guide to disseminate the information to users in an organized and easy to follow manner.

Since April 2020, users have accessed these guides a total of 64,986 times. Our most popular guides are APA and Indigenous Resources.

2. Scope of this PIA

The part of the initiative that this PIA covers is specifically to determine FOIPPA risk and compliance in licensing LibCal.

3. Related Privacy Impact Assessments

No other PIAs have been conducted at JIBC with respect to this initiative.

Several PIAs have been completed for this software by other institutions in British Columbia including Camosun College, Okanagan College, Royal Roads, Simon Fraser University and University of Victoria.

4. Elements of Information or Data

No personal information is stored outside of Canada. This pertains to personal information as any recorded information that uniquely identifies you, such as your name, address, telephone number, age, sex, race, religion, sexual orientation, disability, fingerprints, or blood type. It includes information about your health care, educational, financial, and criminal or employment history. It also includes anyone else's opinions about you and your own views or opinions.

- Springshare is fully compliant with GDPR as of May 25, 2018
- Springshare Privacy Policy
- Springshare LLC Privacy Trust Certificate

If personal information is involved in your initiative, please continue to the next page to complete your PIA.

If no personal information is involved, please submit Parts 1, 6, and 7 to your privacy office(r). They will guide you through the completion of your PIA.

Part 2 – Protection of Personal Information

In the following questions, delete the descriptive text and replace it with your own.

5. **Storage or Access outside Canada**

S.15(1)(l)

6. **Data-linking Initiative***

In FOIPPA, "data linking" and "data-linking initiative" are strictly defined. Answer the following questions to determine whether your initiative qualifies as a "data-linking initiative" under the Act. If you answer "yes" to all 3 questions, your initiative may be a data linking initiative and you must comply with specific requirements under the Act related to data-linking initiatives.		
1. Personal information from one database is linked or combined with personal information from another database; *- For appointment scheduling, Teams (once we have Microsoft Office 365) will be **integrated** with LibCal to assist with the scheduling of appointments.* *- After a patron has booked an online appointment with the staff member, the link to start the Microsoft Teams meeting will be included in the confirmation email that the patron receives for the appointment, and the '.ics' file (calendar file extension) that is attached to that confirmation email can be added to the staff member's Outlook calendar and patron's calendar.*		yes
2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;		no
3. The data linking is occurring between either (1) two or more public bodies or (2) one or more public bodies and one or more agencies.		no
If you have answered "yes" to all three questions, please contact your privacy office(r) to discuss the requirements of a data-linking initiative.		

7. Common or Integrated Program or Activity*

In FOIPPA, "common or integrated program or activity" is strictly defined. Answer the following questions to determine whether your initiative qualifies as "a common or integrated program or activity" under the Act. If you answer "yes" to all 3 of these questions, you must comply with requirements under the Act for common or integrated programs and activities.	
1. This initiative involves a program or activity that provides a service (or services);	yes
2. Those services are provided through: (a) a public body and at least one other public body or agency working collaboratively to provide that service; or (b) one public body working on behalf of one or more other public bodies or agencies;	no
3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.	yes
Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.	

* Please note: If your initiative involves a "data-linking initiative" or a "common or integrated program or activity", advanced notification and consultation on this PIA must take place with the Office of the Information and Privacy Commissioner (OIPC). Contact your public body's privacy office(r) to determine how to proceed with this notification and consultation.

For future reference, public bodies are required to notify the OIPC of a" data-linking initiative" or a "common or integrated program or activity" in the early stages of developing the initiative, program or activity. Contact your public body's privacy office(r) to determine how to proceed with this notification.

8. Personal Information Flow Diagram and/or Personal Information Flow Table

Please provide a diagram and/or table that shows how your initiative will collect, use, and/or disclose personal information (see examples below). Your diagram and/or table must also include the authorities for the collection, use, and disclosure of personal information, as laid out in FOIPPA. It should also outline the flows of personal information wherever it is transmitted or exchanged.
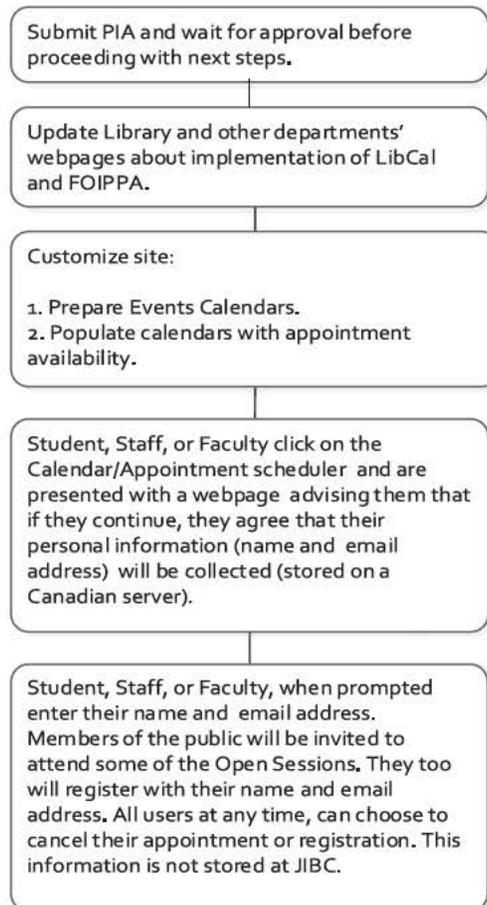
Both a flow diagram and a table must be included if the PIA is related to a common or integrated program or activity or a data-linking initiative.

LibCal Privacy Impact Assessment

Submit PIA and wait for approval before proceeding with next steps.

Update Library and other departments' webpages about implementation of LibCal and FOIPPA.

Customize site:

1. Prepare Events Calendars.
2. Populate calendars with appointment availability.

Student, Staff, or Faculty click on the Calendar/Appointment scheduler and are presented with a webpage advising them that if they continue, they agree that their personal information (name and email address) will be collected (stored on a Canadian server).

Student, Staff, or Faculty, when prompted enter their name and email address. Members of the public will be invited to attend some of the Open Sessions. They too will register with their name and email address. All users at any time, can choose to cancel their appointment or registration. This information is not stored at JIBC.

Example:

Examples can be removed and additional lines added as needed.

Personal Information Flow Table			
	Description/Purpose	**Type**	**FOIPPA Authority**
1.	Personal information is obtained when the user: • books an appointment, • registers for an event, or • books a space	Collection	26(c)

9. Risk Mitigation Table

Risk Mitigation Table				
	Risk	**Mitigation Strategy**	**Likelihood**	**Impact**
1.	Student personal information is compromised when transferred to or from the service provider	Transmission is encrypted and the encryption keys only exist in Canada (see PUA-01-06 in attachment)	Low	Medium

10. Collection Notice

JIBC Library will not collect any user information. Statistics are gathered to record the number of times the service is accessed on a monthly basis. This information is not at the user level.

This information is gathered to justify the licensing of this product. Statistics are reviewed yearly, to determine if the cost of the product is justified against the benefits to students and staff.

A notice will be posted on JIBC webpages at the point where users will be accessing LibCal to schedule appointments or to register for events:

JIBC makes the LibCal service available to you for your convenience. Your use of the LibCal service at Justice Institute of British Columbia is voluntary. JIBC does not collect information about you. Any personal information you disclose to LibCal is stored on servers located in Canada. Springshare does not use, sell or commoditize any customer data stored in its tenant or customer profile metadata.

By logging in to LibCal, you consent to the collection of information about you by Springshare.

Part 3 – Security of Personal Information

If this PIA involves an information system, or if it is otherwise deemed necessary to do so, please consult with your public body's privacy office(r) and/or security personnel when filling out this section. They will also be able to tell you whether you will need to complete a separate security assessment for this initiative.

11. **Please describe the physical security measures related to the initiative (if applicable).**

S.15(1)(l)

██

12. **Please describe the technical security measures related to the initiative (if applicable).**

██
██████████████████████████████████

13. **Does your branch/department rely on any security policies?**

Yes, the JIBC relies on the following policies:
JIBC Policy 2502: Information Security Policy,
JIBC Policy 2503: Information & Educational Technology Acceptable Use Policy,
JIBC Policy 3106: Freedom of Information and Protection of Privacy

14. **Please describe any access controls and/or ways in which you will limit or restrict unauthorized changes (such as additions or deletions) to personal information.**

Only the main system administrator can make changes to the appointments, calendars, seats and spaces. Only the main system administrator can remove or add users to provide access to creating calendars and appointments. The system administrator cannot change any personal information.

15. **Please describe how you track who has access to the personal information.**

We track the system administrators using a list in LibCal's Admin dashboard. The only information they have access to is the other system administrators' names and email addresses.

Patrons who either book an appointment or register for an event must provide their first and last name and email address. This information is not shared with LibCal and is only visible to the staff member that the appointment or event is scheduled with.

Part 4 – Accuracy/Correction/Retention of Personal Information

16. How is an individual's information updated or corrected? If information is not updated or corrected (for physical, procedural or other reasons) please explain how it will be annotated? If personal information will be disclosed to others, how will the public body notify them of the update, correction or annotation?

    The information provided by the patrons cannot be updated or corrected. The only action users can take is to cancel their appointment or registration to scheduled events.

17. Does your initiative use personal information to make decisions that directly affect an individual(s)? If yes, please explain.

    No

18. If you answered "yes" to question 17, please explain the efforts that will be made to ensure that the personal information is accurate and complete.

    Not applicable

19. If you answered "yes" to question 17, do you have a records retention and/or disposition schedule that will ensure that personal information is kept for at least one year after it is used in making a decision directly affecting an individual?

    Not applicable

Part 5 – Further Information

20. Does the initiative involve systematic disclosures of personal information? If yes, please explain.

    No

    > *Please check this box if the related Information Sharing Agreement (ISA) is attached. If you require assistance completing an ISA, please contact your privacy office(r).*

21. Does the program involve access to personally identifiable information for research or statistical purposes? If yes, please explain.

    No

Please check this box if the related Research Agreement (RA) is attached. If you require assistance completing an RA please contact your privacy office(r).	

22. **Will a personal information bank (PIB) result from this initiative? If yes, please list the legislatively required descriptors listed in section 69 (6) of FOIPPA. Under this same section, this information is required to be published in a public directory.**

No

Please ensure Parts 6 and 7 are attached to your submitted PIA.

Part 6 – Privacy Office(r) Comments

This PIA is based on a review of the material provided to the Privacy Office(r) as of the date below. If, in future any substantive changes are made to the scope of this PIA, the public body will have to complete a PIA Update and submit it to Privacy Office(r).

The information in this PIA has established that the tool in question may be used for its intended purpose without any conditions.

Derek Deacon   Digitally signed by Derek Deacon
Date: 2021.03.03 14:34:00 -08'00'

Privacy Officer/Privacy Office Representative	Signature	Date

Part 7 – Program Area Signatures

_____	**April Haddad** Digitally signed by April Haddad Date: 2021.03.03 17:25:10 -08'00'	March 3, 2021
Program/Department Manager	Signature	Date

_____	**Mike Proud** Digitally signed by Mike Proud DN: cn=Mike Proud, o=JIBC, ou=Finance, email=mproud@jibc.ca, c=CA Date: 2021.03.03 16:24:41 -08'00'	March 3, 2021
Head of Public Body, or designate	Signature	Date

A final copy of this PIA (with all signatures) must be kept on record.

If you have any questions, please contact your public body's privacy office(r) or call the OCIO's Privacy and Access Helpline at 250 356-1851.